



Order Filed on March 2, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

Authorized Agent for Secured Creditor

130 Clinton Road, Lobby B, Suite 202

Fairfield, NJ 07004

Telephone: 973-575-0707

Facsimile: 973-404-8886

Harold Kaplan (HK0226)

In Re:

Kathleen L Baylock

fka Kathleen L Mason

fka Kathleen L Langston

Debtor,

Case No.: 19-23780-JNP

Chapter: 13

Hearing Date: February 4, 2020

Judge: Jerrold N. Poslusny Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: March 2, 2020

A handwritten signature in dark ink, appearing to read "Jerrold N. Poslusny, Jr.", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

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Secured Creditor: Ditech Financial LLC

Secured Creditor's Counsel: RAS Citron, LLC

Debtors' Counsel: Mark W Ford, Esq.

Property Involved ("Collateral"): 1446 South 9th Street, Camden, New Jersey 08104

Relief sought: ■ Motion for relief from the automatic stay
 □ Motion to dismiss
 □ Motion for prospective relief to prevent imposition of automatic stay
 against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

■ The Debtor is overdue for 6 months from August 1st, 2019 through January 1st 2019.

■ The Debtor is overdue for 6 payments from August 1st, 2019 at \$864.22 per month.

Funds Held In Suspense \$0.00.

Total Arrearages Due \$5,185.32.

2. Debtor must cure all post-petition arrearages, as follows:

■ Beginning on February 1st, 2020, regular monthly mortgage payments shall continue to be made in the amount of \$864.22.

■ Beginning on February 15th, 2020, monthly cure payments shall be made in the amount of \$864.22 for 6 months.

3. Payments to the Secured Creditor shall be made to the following address(es):

■ Regular monthly payment: Ditech Financial LLC
ATTN: Bankruptcy Dept
PO BOX 94710
Palatine, IL 60094-4710

■ Monthly cure payment: Ditech Financial LLC
ATTN: Bankruptcy Dept
PO BOX 94710
Palatine, IL 60094-4710

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

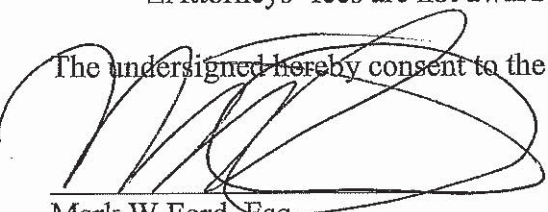
The fees and costs are payable:

■ Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.



Mark W Ford, Esq.
Attorney for Debtor(s)
Date:

/s/ Harold Kaplan

Harold Kaplan, Esq.
Attorney for Secured Creditor
Date: 3/2/2020